

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	:	
	:	
PLAINTIFF,	:	
	:	
v.	:	CRIMINAL NO. 14-CR-30181-NJR
	:	
	:	
JOEL LOPEZ-ESPERIUETA, JR.,	:	
	:	
	:	
	:	
DEFENDANT.	:	

MOTION TO DISMISS FORFEITURE

Now comes the United States of America, by and through its Attorneys, James L. Porter, Acting United States Attorney, for the Southern District of Illinois, and Monica A. Stump, Assistant United States Attorney, and requests that the forfeiture allegation in the Superseding Indictment be dismissed without prejudice against Defendant Joel Lopez-Esperiueta, Jr.

Respectfully submitted,

JAMES L. PORTER
Acting United States Attorney

/s/ Monica A. Stump
MONICA A. STUMP
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	CRIMINAL NO. 14-CR-30181-NJR
vs.	:	
	:	
JOEL LOPEZ-ESPERIUETA, JR.,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2016, I caused to be electronically filed the foregoing MOTION TO DISMISS FORFEITURE with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

James M. Stern

and I hereby certify that on March 24, 2016, I also caused to be mailed by United States Postal Service, the document(s) to the following non-registered participants:

NONE.

Respectfully submitted,

JAMES L. PORTER
Acting United States Attorney

/s/ Monica A. Stump
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